

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-04330 (SMB)

**STIPULATION EXTENDING TIME FOR DEFENDANT TO ANSWER,  
MOVE OR OTHERWISE RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendant Square One Fund Ltd. (the “Defendant”), by and through their undersigned counsel, that the time by which the Defendant may answer, move, or otherwise respond to the Trustee’s complaint (the “Complaint”) is extended up to and including April 26, 2017. Nothing in this Stipulation is a waiver of the right to request from the Court a further extension of time to answer, move, or otherwise respond and/or the Trustee’s right to object to such request.

Undersigned counsel for the Defendant represents that service of process of the summons and Complaint on the Defendants has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendant.

Except as expressly set forth herein, the parties to this Stipulation reserve all objections, rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such objections, rights and defenses, including without limitation challenges to personal jurisdiction, venue, or the jurisdiction of this Court or any other court. It is further understood that nothing herein shall constitute a waiver of any objections, rights, or defenses that any other defendant may have in this action.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

This Stipulation is entered into pursuant to the Order Granting Supplemental Authority  
To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No.  
14447) in the above-captioned case (No. 08-01789 (SMB)).

Dated: December 19, 2016  
New York, New York

/s/ Marco Molina

Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marco Molina  
mmolina@bakerlaw.com  
Andrew M. Serrao  
aserrao@bakerlaw.com

/s/ Tammy P. Bieber

Thompson Hine LLP  
335 Madison Avenue  
New York, New York 10017  
Telephone: (212) 908-3910  
Facsimile: (212) 344-6101  
Tammy P. Bieber  
Email: Tammy.Bieber@ThompsonHine.com

*Attorneys for Defendant Square One Fund  
Ltd.*

*Attorneys for Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the estate of  
Bernard L. Madoff*